

Milbank

SCOTT A. EDELMAN

Partner and Chairman

55 Hudson Yards | New York, NY 10001-2163

T: 212.530.5149

sedelman@milbank.com | milbank.com

November 11, 2020

VIA ECF

MEMO ENDORSED

Hon. Edgardo Ramos, U.S.D.J.
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Courtroom 619
New York, NY 10007

Re: *Villella v. Chemical and Mining Company of Chile, Inc. et al.*, 15-cv-2106-ER

Dear Judge Ramos:

We write to inform the Court that the parties to the above-captioned class action have entered into a binding agreement to settle the action. Defendant Chemical and Mining Company of Chile (a/k/a Sociedad Química y Minera de Chile S.A., or “SQM”) publicly announced the settlement today.

The parties are currently preparing the relevant documentation to submit to the Court for preliminary approval of the settlement. The parties request that the Court schedule a hearing on the motion for preliminary approval for December 17, 2020, or as soon thereafter as is convenient for the Court.

In light of the proposed settlement, the parties jointly request that the Court enter a stay of the action.

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Hon. Edgardo Ramos
November 11, 2020

Respectfully submitted,

**ROBBINS GELLER RUDMAN
& DOWD LLP**

By: /s/ Aelish M. Baig
Aelish M. Baig
Matthew S. Melamed
Armen Zohrabian
John H. George
Post Montgomery Center
One Montgomery Street, Suite 1800
San Francisco, CA 94104
Telephone: 415-288-4545

Samuel H. Rudman
58 South Service Road, Suite 200
Melville, NY 11747
Telephone: 631-367-7100

Sabrina E. Tirabassi
120 East Palmetto Park Road, Suite 500
Boca Raton, FL 33432
Telephone: 561-750-3000

Counsel for Lead Plaintiff

cc: All Counsel of Record (via ECF)

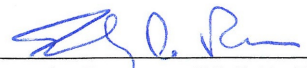
MILBANK LLP

By: /s/ Scott A. Edelman
Scott A. Edelman
Grant R. Mainland
Alison Bonelli
55 Hudson Yards
New York, New York 10001
Telephone: 212-530-5000

*Attorneys for Defendant Chemical and
Mining Company of Chile, Inc.*

A hearing on the motion for preliminary approval of the settlement agreement will be held on December 18, 2020 at 10am. The hearing will be held remotely and telephonically. The parties are instructed to call 877-411-9748 and enter access code 3029857# when prompted. The Clerk of Court is respectfully directed to stay this case.

The application is x granted
_____ denied



Edgardo Ramos, U.S.D.J.
Dated: 11/12/2020
New York, New York